



A business advisory and advocacy law firm®

McDonald Hopkins PLC
300 N. LaSalle Street
Suite 1400
Chicago, IL 60654

P 1.312.280.0111
F 1.248.646.5075

Jennifer W. Torrez, Esq.
Direct Dial: 312.642.7056
E-mail: jtorrez@mcdonaldhopkins.com

March 4, 2025

VIA ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
United States Courthouse Room 17A
500 Pearl St.
New York, NY 10007

**Re: *Elizabeth Stachovic, et al. v. Pig Newton, Inc.*, Case No. 1:24-cv-6589:
Amended Case Management Plan**

Dear Judge Figueredo:

We represent defendant Pig Newton, Inc. in the above-referenced matter. We write this letter jointly with counsel for plaintiff Elizabeth Stachovic to correct a typographical error in the parties' Report of Rule 26(f) Conference and Proposed Case Management Plan (ECF No. 22), which this Court entered on February 24, 2025. (ECF No. 23.)

As set forth in Section 9(b) of the Report of Rule 26(f) Conference and Proposed Case Management Plan, the deadline for completion of expert discovery is March 13, 2026. (ECF No. 23, p. 5.) The following paragraph provides that the parties must certify the completion of discovery within one week of the close of expert discovery. As such, the deadline should be March 20, 2026. However, the Report incorrectly shows that date as March 20, 2025.

Filed herewith for the Court's review and approval is an Amended Report of Rule 26(f) Conference and Proposed Case Management Plan. The parties respectfully request that this Court enter an order amending paragraph 9 of ECF No. 23 consistent with the parties' amended filing.

Thank you for your time and attention to this matter. We will await further word from the Court.

Very truly yours,

A handwritten signature in black ink, appearing to read "JW Torrez".

Jennifer W. Torrez, Esq. (*pro hac vice*)

Cc: Plaintiff's counsel of record (via ECF)